

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America

v.

Ilya Lichtenstein (AKA: Ilya "Dutch" Lichtenstein, Ilya
Likhtenshteyn) (DOB: XXXXXXXX), and
Heather Rhiannon Morgan (AKA: Razzlekhan)
(DOB: XXXXXXXX)

Defendant(s)

Case: 1:22-mj-00022

Assigned to: Judge Meriweather, Robin M.

Assign Date: 2/7/2022

Description: COMPLAINT W/ ARREST WARRANT

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 2016 to February 2022 in the county of _____ in the
_____ in the District of Columbia, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 1956(h) (Money Laundering Conspiracy)

18 U.S.C. § 371 (Conspiracy To Defraud the United States)

This criminal complaint is based on these facts:

See attached statement of facts.

☒ Continued on the attached sheet.

*Complainant's signature*Christopher Janczewski, Special Agent*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1
by telephone.

Date: 02/07/2022

  Robin M. Meriweather
2022.02.07 11:10:43
-05'00'

*Judge's signature*City and state: Washington, D.C.Robin M. Meriweather, U.S. Magistrate Judge*Printed name and title*